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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LINDA GATSON, an individual,

Case No: 3:14-CV-04161-JST

Plaintiff,
vs.

**STIPULATION TO EXTEND FACT
DISCOVERY CUT-OFF DATE;
PROPOSED ORDER**

OCWEN LOAN SERVICING, LLC; and
Does 1 through 100, inclusive;

Complaint Filed: September 15, 2014
Trial Date: April 4, 2016

Defendants.

RECITALS

Plaintiff LINDA GATSON and Defendant OCWEN LOAN SERVICING, LLC
(collectively, the “Parties”) by and through their respective counsel of record, and subject to the
Court’s approval, hereby stipulate and agree as follows:

WHEREAS, the Court referred this case to mediation, and a mediation before appointed mediator, Gilda R. Turitz is scheduled to proceed on September 29, 2015;

WHEREAS the parties have been and will continue to discuss and attempt to negotiate a possible settlement of this matter up to and through the date of the scheduled mediation;

WHEREAS, Defendant intends to depose Plaintiff, who is elderly, and in order to avoid the costs and imposition of a deposition if this matter should settle by the September 29, 2015 mediation, the Parties agree that it is the best interest of the Parties to continue the current fact discovery cut-off deadline of October 2, 2015 until November 6, 2015, which will allow Defendants to depose Plaintiff after the mediation if the case remains unresolved;

WHEREAS, the Parties agree that an extension of the fact discovery cut-off date would allow the Parties to facilitate a possible resolution of this dispute while at the same time save time and resources associated with preparation for, travel to, and attendance at Plaintiff's deposition; and

WHEREAS, the extension of the fact discovery cut-off date from October 2, 2015 to November 6, 2015 is not requested for purposes of delay and will not result in any prejudice.

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STIPULATION

IT IS THEREFORE STIPULATION AND AGREED, by and among the Parties, and subject to the approval of the Court, that:

1. The fact discovery cut-off date in this matter be extended to November 6, 2015.

Respectfully Submitted,

DATED: September 3, 2015

MELLEN LAW FIRM

/s/ Sarah Shapero

Sarah Shapero
Attorneys for Plaintiff
Linda Gatson

DATED: September 3, 2015

Houser & Allison

/s/ Jason K. Boss

Jason K. Boss
Attorneys for Defendant
Ocwen Loan Servicing, LLC

PROPOSED ORDER

Having reviewed the above stipulation of the Parties and good cause appearing therefore, IT
IS SO ORDERED.

DATED: September 3, 2015

